

CHAPTER 24 TRAINING AND MEDICAL SURVEILLANCE

24-1. Introduction.

a. This chapter summarizes the training requirements which must be completed by USACE and contractor personnel prior to conducting OE response activities. The training will be conducted by instructors who meet the trainer qualifications identified in 29 CFR 1910.120(e)(5).

b. All USACE and contractor personnel working on-site who are exposed to hazardous substances, health hazards, or safety hazards, and their supervisors and management responsible for the site, will receive training meeting the requirements of 29 CFR 1910.120(e). These personnel will receive training before being permitted to engage in operations that would expose them to hazardous substances, safety, or health hazards. They will receive updated training on an annual basis.

24-2. Subject Matter Requirements.

a. Employees will be trained in the following items at the beginning of each project:

- (1) Names of persons and alternates responsible for site safety.
- (2) Safety, health, and other hazards known to be on the site.
- (3) Use of personal protective equipment.
- (4) Work practices to minimize hazards.
- (5) Safe use of equipment and other controls on site.
- (6) Medical surveillance requirements.
- (7) Decontamination procedures (if necessary).
- (8) An emergency response plan.
- (9) Confined space entry procedures (if applicable).
- (10) A spill containment program (if applicable).

b. Additional site-specific training covering site hazards, procedures, and all contents of the approved SSHP will be conducted by the UXOSO. This training will be provided for all on-site employees, including those assigned only to the Support Zone, prior to the commencement of

work; for visitors prior to entering the site; and on a continual basis. Completion of specialized, site-specific training will be documented by the UXOSO.

24-3. Mandatory Training. This section discusses the initial, Cardiopulmonary Resuscitation (CPR)/First Aid, and refresher training requirements for personnel engaged in OE response actions. This section also addresses training certification and documentation.

a. Initial Training.

(1) 40-Hour Training. All workers engaged in hazardous substance removal or other activities on an OE site which expose or may expose them to hazardous substances and health hazards will receive a minimum of 40 hours of instruction off-site and a minimum of three days actual field experience under the direct supervision of a trained, experienced supervisor.

(2) 24-Hour Training. On OE sites, workers and supervisors only occasionally on-site or those who are assigned to a single project only, and who are unlikely to be exposed over OSHA Permissible Exposure Limits or other exposure limits of a national consensus standard, will receive a minimum of 24 hours of instruction off-site, and a minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor. These workers may be engaged in clearing brush, land surveying, geophysical surveying, etc.

(3) On-site Management and Supervisor Training. On-site management and supervisors directly responsible for or who supervise workers engaged in activities which may potentially expose them to hazardous substances and health hazards at OE sites will receive an additional 8 hours of supervisory training. It is the responsibility of the UXOSO to maintain current records and verify the training status of all on-site personnel.

(4) Workers Outside of Controlled Area Training. Workers regularly on-site who work in areas outside the exclusion zone will receive a minimum of 24 hours of instruction off-site and a minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor.

(5) Noise Training. Workers exposed to high noise levels at the OE site must be provided training on the physical and psychological effects of high noise levels; noise exposure limits; and the selection, use, and limitations of hearing protection devices.

(6) Site Visitor Training. Visitors to an OE site prior to cleanup work beginning for the purpose of viewing the site for contractor bids, determining terrain conditions, size of area, etc., are not be required to have HAZWOPER training. All site visitors must be informed of physical hazards of the site and methods to control those hazards.

(7) Office and Administrative Worker Training. Project personnel whose jobs should never require them to enter the exclusion zone will be provided a site-specific safety briefing. These personnel may include clerical workers and office geophysicists.

b. Refresher Training. All employees requiring 40-hour or 24-hour training, as well as managers and supervisors, will receive eight hours of refresher training annually on the items specified in paragraph 24-2. Employees will also critique any incidents that have occurred in the past year that can serve as training examples of related work, and other relevant topics.

c. First Aid and CPR Training.

(1) When a medical facility or physician is not accessible within five minutes to a group of two or more employees for the treatment of injuries, at least two employees on each shift will be qualified to administer first aid and CPR.

(2) Employees designated as responsible for rendering first aid or medical assistance will be:

(a) Included in their employer's blood-borne pathogen program in accordance with 29 CFR 1910.1030.

(b) Instructed in the sources, hazards, and avoidance of blood-borne pathogens.

(c) Provided with, use, and maintain personal protective equipment when appropriate for rendering first aid or other medical assistance to prevent contact with blood or other potentially infectious materials.

d. Training Certification. Each employee successfully completing the training and field experience requirements specified above will be certified as having successfully completed the necessary training. A written certificate will be given to each person certified. The certificate or a copy of the certificate will be maintained at the project site as proof of the completion of the training. Any person not certified is prohibited from engaging in on-site OE response operations. The only exception is individuals who can show by past experience and/or training that they have had the equivalent to the above initial training.

e. Documentation. All health and safety training, including the names of employees trained, the duration of the training, the contents of the training courses, and the dates of training will be documented and appended to the SSHP. Records must be kept to ensure identified personnel receive appropriate initial health and safety training and annual refresher courses. Response action contractors and visitors must provide evidence of health and safety training before site entry is authorized.

24-4. Medical Surveillance. This section discusses the following aspects of the medical surveillance program: participation requirements, medical examinations, certification and recordkeeping.

a. Participation Requirements.

(1) All personnel performing on-site activities that meet or exceed the requirements and inclusion criteria in 29 CFR 1910.120/29CFR 1926.65(f), and EM 385-1-1 (or other applicable military requirements) will participate in an ongoing medical surveillance program.

(2) In consultation with the Occupational Physician, the minimum content and frequencies of necessary medical examinations will be determined. This determination will be based upon probable site conditions, potential occupational exposures, and required PPE.

b. Medical Examinations.

(1) Examinations will be performed by or under the supervision of a licensed physician, preferably one knowledgeable in occupational medicine. Examination and/or test results will be reviewed by the Occupational Physician.

(2) The written opinion from the attending physician required by 29 CFR 1910.120/ 29 CFR 1926.65(f)(7) will be made available upon request to the CO or approving authority for any site employee.

c. Certification. Certification of employee participation in the medical surveillance program will be appended to the SSHP. This certification will include the employee's name, the date of last examination, and name of reviewing occupational physician.

d. Recordkeeping. All personnel medical monitoring records will be maintained in accordance with 29 CFR 1910.120.